From: Pinkerton, Blake
To: Hess, Alana

Cc: Wells, Jay, Henry, Tadd, Farmer, Kevin

Subject: RE: 2015-04-093 New Madrid Power Plant (143-0004)

Date: Monday, April 10, 2017 4:27:55 PM
Attachments: New Madrid 2016 MATS NOC.pdf

NM 2016 Hg 30BOD Performance Test NOC.pdf

NM MATS Extension.pdf

Ms. Hess.

Please see the responses to your questions below regarding our New Madrid Power Plant.

Please provide answers to the following questions:

- 1. Are the two 2.4 MMBtu/hr fuel oil heaters in No Construction Permit Required Determination 2016-01-004 (2016-01-004.pdf) EU0290 and EU0300 Tioga Heaters or are these different heaters? The Tioga Heaters referenced as EU0290 and EU0300 are hard piped stationary units used at the crusher house. The units referenced in the No Construction Permit Required Determination are the same type/size, but skid mounted (portable) and rented for short term use during the winter months.
- 2. No Construction Permit Required Determination 2012-06-072 states that you planned to use 14 275 HP barge pumps instead of EP-09 8 300 HP barge pumps and EP-13 2 345 HP barge pumps. Did this change occur? **The change did not occur. Still have the 8 as EP-09 and 2 as EP-13.**
- 3. How many acres are active at any given time in the landfill? Each cell is 25 acres. Only 1 cell will be "active" at a time. Currently using Phase L- Cell 1, will switch to Phase III Cell 2 when full.
- 4. Construction Permit 092006-004 states that Boilers 1 and 2 have an MHDR of 7,150 MMBtu/hr, EPA's Air Markets Program indicates that Boiler 1 has an MHDR of 6,728 MMBtu/hr and Boiler 2 has an MHDR of 6,985 MMBtu/hr; however, the previous operating permit and your application state the MHDRs are only 6,340 MMBtu/hr. Please explain these discrepancies. EPA generally requires us to use the MHDR in the Air Markets Program unless sufficient justification can be provided for an increase/decrease in the MHDR... I do not have the historical data on this but the higher number may have been used to represent the higher BTU Illinois coal before the switch to PRB. We are not opposed to using the numbers listed in the Air Markets Program but what would the implications be for using those numbers if it is found that the 6,340 MMBtu/hr is a better number?
- 5. Would you please send me a copy of New Madrid's MATS initial NOC? I have attached a copy to this email.

From: Hess, Alana [mailto:Alana.Hess@dnr.mo.gov]

Sent: Wednesday, March 29, 2017 3:01 PM

To: Wells, Jay < <u>JWells@aeci.org</u>>; Henry, Tadd < <u>thenry@aeci.org</u>> **Subject:** RE: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

Please provide answers to the following questions:

- 1. Are the two 2.4 MMBtu/hr fuel oil heaters in No Construction Permit Required Determination 2016-01-004 (2016-01-004.pdf) EU0290 and EU0300 Tioga Heaters or are these different heaters?
- 2. No Construction Permit Required Determination 2012-06-072 states that you planned to use 14 275 HP barge pumps instead of EP-09 8 300 HP barge pumps and EP-13 2 345 HP barge pumps. Did this change occur?
- 3. How many acres are active at any given time in the landfill?
- 4. Construction Permit 092006-004 states that Boilers 1 and 2 have an MHDR of 7,150 MMBtu/hr, EPA's Air Markets Program indicates that Boiler 1 has an MHDR of 6,728 MMBtu/hr and Boiler 2 has an MHDR of 6,985 MMBtu/hr; however, the previous operating permit and your application state the MHDRs are only 6,340 MMBtu/hr. Please explain these discrepancies. EPA generally requires us to use the MHDR in the Air Markets Program unless sufficient justification can be provided for an increase/decrease in the MHDR...
- 5. Would you please send me a copy of New Madrid's MATS initial NOC?

Alana L. Hess, PE

Environmental Engineer III
Missouri Department of Natural Resources

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Mailing Address:

Air Pollution Control Program – Permits Section

Attn: Alana Hess P.O. Box 176

Jefferson City, MO 65102

From: Hess, Alana

Sent: Tuesday, March 28, 2017 10:41 AM **To:** 'jwells@aeci.org'; thenry@aeci.org

Subject: 2015-04-093 New Madrid Power Plant (143-0004)

Mr. Wells,

My name is Alana Hess. I am an Environmental Engineer with the Missouri Department of Natural Resources' Air Pollution Control Program. I have been assigned to review the Part 70 operating permit renewal application, Project 2015-04-093, for New Madrid Power Plant (143-0004).

I may have questions for you throughout my review and drafting of the permit. Please respond to all questions within 15 days. An extension is available upon request.

I look forward to working with you.

Thanks,

Alana L. Hess, PE

Environmental Engineer III
Missouri Department of Natural Resources

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